

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

VICOF II TRUST; VIDA LONGEVITY FUND, LP;
WELLS FARO BANK, NATIONAL
ASSOCIATION, as securities intermediary for
VICOF II TRUST and VIDA LONGEVITY FUND,
LP; and PF PARTICIPATION FUNDING TRUST,

Plaintiffs,

v.

JOHN HANCOCK LIFE INSURANCE COMPANY
OF NEW YORK,

Defendant.

Index No. 19-cv-11093 (AKH)

VICOF II TRUST; VIDA LONGEVITY FUND, LP;
LIFE ASSETS TRUST II S.A. DELAWARE TRUST;
VIDAQUANT SUBFUND DELAWARE TRUST;
VIDA INSURANCE FUND II SERIES INTERESTS
OF THE SALI MULTI-SERIES FUND, LP; WELLS
FARGO BANK, NATIONAL ASSOCIATION, as
securities intermediary for VICOF II TRUST, VIDA
LONGEVITY FUND, LP, LIFE ASSETS TRUST II
S.A. DELAWARE TRUST, VIDAQUANT
SUBFUND DELAWARE TRUST, and VIDA
INSURANCE FUND II SERIES INTERESTS OF
THE SALI MULTI-SERIES FUND, LP; DLP
MASTER TRUST; DLP MASTER TRUST II; GWG
DLP MASTER TRUST LIFE FUNDING TRUST; PF
PARTICIPATION FUNDING TRUST; and PALM
BEACH SETTLEMENT COMPANY,

Plaintiffs,

v.

JOHN HANCOCK LIFE INSURANCE COMPANY
(U.S.A.),

Defendant.

EFG BANK AG, CAYMAN BRANCH; and WELLS
FARGO BANK, NATIONAL ASSOCIATION, as
securities intermediary for EFG BANK AG,
CAYMAN BRANCH,

Plaintiffs,

v.

JOHN HANCOCK LIFE INSURANCE COMPANY
(U.S.A.),

Defendant.

**ORDER REGARDING DEFENDANTS'
MOTION FOR CONTINUED SEALING**

Pursuant to the May 28, 2020 Court-approved Stipulated Confidentiality Agreement and Protective Order, ECF No. 34 (the “Protective Order”), and Rule 4(B) of the Individual Rules of the Honorable Alvin K. Hellerstein, Defendants John Hancock Life Insurance Company of New York and John Hancock Life Insurance Company (U.S.A.) (“John Hancock”) move to maintain under seal or in redacted form materials identified in Exhibit 1 hereto and attached to the Declaration of Khai LeQuang in Support of Plaintiffs’ Motions *in Limine* Nos. 1-8.

For the reasons set forth in John Hancock’s Memorandum of Law and the Declaration of Zahir Bhanji, John Hancock’s motion is **GRANTED**.

IT IS SO ORDERED.

February 23, 2023

/s/ Alvin Hellerstein

THE HONORABLE ALVIN K. HELLERSTEIN
UNITED STATES DISTRICT JUDGE

EXHIBIT 1

LeQuang Decl. Exhibit	Description	Sealing Treatment
1	Confidential Correspondence Between John Hancock and State Insurance Regulator	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters and analysis of product performance and profitability.
2	Confidential Correspondence Between John Hancock and State Insurance Regulator	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters and analysis of product performance and profitability.
3	John Hancock Life Insurance Product Pricing Memorandum	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability.
4	Correspondence Regarding Pricing of John Hancock Life Insurance Product	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability.
5	John Hancock Life Insurance Product Pricing Memorandum	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability.
6	Proprietary John Hancock Mortality Study	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential actuarial assumptions.
7	Proprietary John Hancock Mortality Study	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential actuarial assumptions.
8	Correspondence Regarding Development of Mortality Study	The Exhibit is sealed in its entirety because it contains discussion of

LeQuang Decl. Exhibit	Description	Sealing Treatment
		proprietary and confidential actuarial assumptions.
9	Correspondence Regarding John Hancock Life Insurance Product Features and Performance	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters.
10	Correspondence Regarding John Hancock Life Insurance Products	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters.
11	Redacted Portions of Expert Report of Larry N. Stern	Redactions to this Exhibit are approved consistent with this Court's prior sealing orders. <i>See</i> ECF Nos. 195, 215, 297.
12	Presentation Regarding John Hancock Life Insurance Business Strategy	The Exhibit is sealed in its entirety because it contains discussion of confidential, non-public business strategy.
13	Presentation Regarding John Hancock Life Insurance Business Strategy	The Exhibit is sealed in its entirety because it contains discussion of confidential, non-public business strategy.
15	Memorandum Regarding John Hancock Business Strategy	The Exhibit is sealed in its entirety because it contains discussion of confidential, non-public business strategy.
16	Presentation Regarding John Hancock Business Strategy	The Exhibit is sealed in its entirety because it contains discussion of confidential, non-public business strategy.
17	Presentation Regarding John Hancock Business Strategy and Contemplated Strategic Initiatives	The Exhibit is sealed in its entirety because it contains discussion of confidential, non-public business strategy.
18	Presentation Regarding John Hancock Business Strategy	The Exhibit is sealed in its entirety because it contains discussion of confidential, non-public business strategy.

LeQuang Decl. Exhibit	Description	Sealing Treatment
19	Confidential John Hancock Submission to State Insurance Regulator	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability.
20	Redacted Portions of Performance UL Inforce Readjustment Memorandum	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability.
21	Confidential Correspondence Between John Hancock and State Insurance Regulator	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters.
22	Confidential Correspondence Between John Hancock and State Insurance Regulator	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters and analysis of product performance and profitability.
24	Correspondence Regarding Development of Proprietary Actuarial Assumptions	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability.
27	Confidential Notes Created by Third-Party Reflecting Telephone Conference Attended by John Hancock Personnel	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, analysis of product performance and profitability, and business strategy.
29	Expert Report of Gregory V. Serio	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters and regulatory environment.
30	Confidential Draft Talking Points for Potential Discussion with State	The Exhibit is sealed in its entirety because it contains discussion of

LeQuang Decl. Exhibit	Description	Sealing Treatment
	Insurance Regulator	proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability.
37	Redacted Portions of Expert Report of Timothy Pfeifer	Redactions to this Exhibit are approved consistent with this Court's prior sealing orders. <i>See</i> ECF Nos. 195, 215.
54	Correspondence Regarding Pricing of John Hancock Life Insurance Product	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters.
55	Presentation Regarding John Hancock Business Prepared by Third-Party Consultant	The Exhibit is sealed in its entirety because it contains discussion of confidential, non-public business strategy.
56	Confidential Notes Created by Third-Party Reflecting Confidential Telephone Conference Attended by John Hancock Personnel	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, analysis of product performance and profitability, and business strategy.
57	Confidential Notes Created by Third-Party Reflecting Confidential Telephone Conference Attended by John Hancock Personnel	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, analysis of product performance and profitability, and business strategy.
58	Proprietary John Hancock Mortality Study	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential actuarial assumptions.
59	John Hancock Experience Study Standards	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential methods for monitoring and analyzing experience data.
61	Correspondence Summarizing Confidential Communications Between John Hancock and State	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing

LeQuang Decl. Exhibit	Description	Sealing Treatment
	Insurance Regulator	parameters and analysis of product performance and profitability.
67	Redacted Portions of Excerpts from July 12, 2022 Deposition of Timothy Pfeifer	Redactions to pages 179 and 186-187, which contain discussion of proprietary and confidential actuarial assumptions, are approved.
N/A	Redacted Portions of Plaintiffs' Motions <i>in Limine</i> Nos. 1-8 that Refer to and/or Summarize Sealed Exhibits to the LeQuang Declaration	Redactions to references and/or summaries in Plaintiffs' Motions <i>in Limine</i> Nos. 1-8 to the Exhibits to the LeQuang Declaration that are the subject of this Motion are approved.